

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF VIRGINIA**

IN RE: Robert E. Goode, Sr.  
Debtor(s)

CHAPTER 13  
CASE NO. 23-60452

**NOTICE OF HEARING ON DEBTOR'S MOTION TO EXTEND AUTOMATIC STAY**

Please take notice that the above-named Debtor(s) has filed a Motion to Extend the Automatic Stay, a true copy of which are attached hereto, and shall submit the same to the Rebecca B. Connelly, Bankruptcy Judge, for approval on **May 11, 2023 at 9:30 a.m.**, or as soon thereafter as the parties may be heard by video conferencing via Zoom URL: <https://vawb-uscourts-gov.zoomgov.com/j/1603692643>; Meeting ID 160 369 2643.

Objections to said Motion to Extend the Automatic Stay must be filed in writing, with copies thereof served on the Trustee and Counsel for the Debtor more than three (3) days before the date of the hearing as set forth above. The failure to file a response by this deadline may result in the Court treating the Motion as uncontested, entering an order granting the Motions prior to the hearing date and canceling the hearing described in this Notice.

I do hereby certify that a copy of this Notice and Motion have been sent to the Chapter 13 Trustee by ECF Mail, to the Debtor and all creditors by first class postage prepaid mail in this case on the after mentioned date.

Dated: 05/03/2023

Robert E. Goode, Sr.

/s/ Stephen E. Dunn, Esq  
Of counsel

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FOR THE WESTERN DISTRICT OF VIRGINIA**

IN RE: Robert E. Goode, Sr.  
Debtor(s)

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**MOTION TO EXTEND AUTOMATIC STAY**

The Debtor, by Counsel, pursuant to Bankruptcy Code Section 362 and states as follows:

1. That on **April 19, 2023**, the Debtor filed in this Court a Petition under Chapter 13 of the US Bankruptcy Code.
2. The Debtor's previous bankruptcy cases are as follows:

(List all cases, filing date, Chapter, status and date of discharge or dismissal)

**20-61206, Filed 08/31/2020, Chapter 13, Dismissed 02/23/2023**

**01-04481, Filed 12/07/2001, Chapter 13, Dismissed 08/30/2004**

**89-01449, Filed 11/21/1989, Chapter 13, Terminated 06/21/1993**

Due to the dismissal of the previous case, the automatic stay will expire 30 days after the date of filing this new petition. The Debtor is requesting that the Court extend the automatic stay for the following reason(s). ***The Debtor's previous case was dismissed due to the following circumstance(s): The Debtor had his son helping him with his finances and was taking funds from him, not leaving enough in his bank account to cover his bankruptcy payment. The Debtor feels he will be successful in his new case as his daughter-in-law is now helping him with his finances. The debtor feels his new plan is feasible for his budget.***

3. **WHEREFORE**, your Debtor prays that the Court, after notice and an opportunity for hearing enter an Order extending the automatic stay until such time the Court deems otherwise.

Dated: 05/03/2023

By: /s/ Stephen E. Dunn  
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